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March 10, 2025

Hon. Judge Jennifer L. Rochon Daniel Patrick Moynihan **United States Courthouse** Courtroom 20B 500 Pearl St. New York, NY 10007-1312

> Heilbut et al. v. Cassava Sciences, Inc., et al., Case No. 1:24-cv-5948 Re:

Motion to File Document Under Seal

## Dear Judge Rochon:

This firm represents Cassava Sciences, Inc. in the above-referenced case. Pursuant to Your Honor's Individual Rule of Practice 4(B)(iii), we request the Court's approval to file under seal Defendants' fulsome motion to seal (the "Motion"), and related confidential letter (the "Letter") with attached exhibits, all filed on March 10, 2025.

The Letter and its exhibits are not judicial documents and do not carry a presumption of public access. This is because the Letter and its exhibits are relevant only to matters outside the substantive issues in the instant litigation, as further argued in the Motion. Thus, here, the factors that legitimately counsel against disclosure far outweigh any presumption of public access to the Letter. Defendants respectfully request the Court permit sealing of the Motion, the Letter, and the related exhibits.

Thank you for your attention and consideration in this matter.

Very truly yours,

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

Caitlin A. Kovacs